

Site: _____
Break: 3.8
Other: _____



RESPONSE TO EPA REGION IV
AND SCDHEC COMMENTS
ON THE
RI/FS POP
FOR THE
MEDLEY FARM SITE

DECEMBER 9, 1988

SEC JOB NO. G-8026

SIRRINE ENVIRONMENTAL CONSULTANTS
GREENVILLE, SOUTH CAROLINA



10910115

1. See amended text in the revised POP.
2. The procedures for classifying surface streams are found in the South Carolina Water Classification Standards, South Carolina Code of Regulations Chapter 61, Regulation 68 - Water Classification, as amended June 14, 1984.
3. State Regulation 61-69, II states the following:

"Tributaries to Classified Waters: Where surface waters are not classified by name in this Regulation, the use classification and numeric standards of the class of the stream to which they are tributary apply, disregarding any site-specific numeric standards for that tributary."

Since Jones Creek and the Big Blue Branch flow into Thicketty Creek, they would also be classified as "B" waters. See amended text.

4. Table 2.1 is corrected in the revised POP.
5. "T" is the accepted reference or true value, as stated in the text.
6. Radian Laboratories uses HPLC-grade water and follows EPA Method 601/602, Section 6.11-6.13, to generate organic-free, deionized trip blank water. See amended text.
7. Procedures for the collection of field blanks and sampler rinsate samples are given in Section 4.4 of the revised POP.
8. Samples will be analyzed for volatile organics, semivolatile organics, pesticides, PCBs, metals and cyanide during Phase IA. The indicator compounds will be selected from the full complement of analyses.
9. The reference in table 5.1 is for monitoring well installations. All wells are to be installed during Phase IA.
10. The two samples with the highest concentrations of semivolatiles will be composited to form the sample for dioxin analysis.
11. Temporary measures will include restricting access to the site in general and to particular installations. Parking a field vehicle at the one vehicular entrance will deter motorized traffic. Incomplete wells will be protected by securing the appropriate casing sub or adapter cap in place with the rotary drill head to prevent access without operating the drill rig. A dedicated security service is not felt to be necessary. After discussion with EPA the use of on-site security will be initiated at critical times if unauthorized access becomes a problem.
12. Available data refers to the quarterly and annual analysis of the Gaffney Water Treatment Plant water for organics and metals by SCDHEC.

13. Potable water will be analyzed for TAL and TCL parameters for the Phase IA field activities. The need to resample the potable water for subsequent field operations will depend on the analytical results from Phase IA and the time interval between operations.
14. See response to Comment No. 13.
15. Samples will be collected from test pits per page 50 of the POP.
16. Experience demonstrates that the use of high pressure/temperature steam cleaning (water at 200 degrees F and 1500 psi) is a reliable and practice procedure for cleaning augers, drilling rods and down hole tools for monitoring well construction. All soil samples will be obtained by driving a stainless steel split spoon sampler ahead of the augers. Split spoon samplers will be decontaminated in accordance with the sampling equipment cleaning procedures described in Section 5.1.7.4 of the amended text. To confirm the appropriateness of the cleaning methods, rinsate samples will be taken and processed in an expedited manner during the initial drilling process. Modification will be made if required.
17. See amended text.
18. See amended text.
19. See response to comment No. 16 and amended text.
20. The criteria for the selection of test pit samples is given in the first paragraph on page 48 of the original POP. Samples will be taken from the most heavily contaminated soils, as determined by organic vapor analyzer and visual assessment. The VOC sample will be thoroughly mixed and containerized as soon as possible, as directed by the Region IV SOP (Section 4.9.6). The VOC samples will be collected and composited prior to the other samples to minimize the volatilization of organics, as described in the revised POP.
21. See amended text.
22. Agreed. See amended text.
23. See response No. 20.
24. See amended text for additional well installation procedures.
25. The use of flush threaded joints is standard for all environmental installations. See amended text.
26. State standards will be observed during all required well installations and abandonments.

27. See amended text.

The use of vegetable oil will be avoided if possible. We do not anticipate that this product, intended for human consumption, will contain constituents of concern, however. Liquinox® soap may be used as a substitute.

28. See response No. 16.

29. The use of sodium bentonite mud will be avoided if possible. If used, a sample of the bentonite will be collected and the need for analysis will be evaluated.

30. If significant fluid loss is observed while drilling with the roller bit a 2-foot-thick bentonite pellet seal will be installed prior to grouting.

31. The procedures for placement of bentonite seals in monitoring wells were presented as Response No. 3 in the document "Response to EPA Region IV comments on the Revised RI/FS Work Plan for the Medley Farm Site" (SEC, July 14, 1988) and incorporated into the August, 1988 Work Plan. The Work Plan was accepted by EPA in their letter to Mr. Les Oakes dated September 7, 1988. Above ground testing will be conducted to confirm the hydration process.

32. A visual assessment of turbidity is a standard observation during well development. See amended text.

The volume of water introduced into the borehole while drilling will be monitored during drilling for reference during well development.

33. Agreed. See amended text.

34. See amended text in Sections 2.5, 5.1.3, 5.8.1, and 8.0.

35. Teflon coated or stainless steel gaffing will be used where required for securing submersible pumps used for well evacuation. Braided polypropylene cord shall be used for bailers. Bailer cord shall be discarded between well locations.

36. See amended text.

37. Groundwater samples are typically collected immediately after purging. Any free product will be noted in the field log book. VOA samples will be collected first. See amended text.

38. See amended text.

39. Custody seals will be placed on all sample containers and on all coolers. See amended text in Sections 5.8.4.2 and 6.5.

40. The Region IV SOP (Section 4.6.4.3) states the following:

Sediment samples for purgeable organic compounds analyses should be thoroughly but gently mixed with a precleaned stainless steel spoon in a precleaned compositing container (Appendix B). The 4-ounce (120-ml) sample container should be filled completely; no head space should remain in the sample containers.

41. The statement is removed from the revised POP.
42. See amended text.
43. See amended text.
44. See amended text.
45. See amended text.
46. Sampling personnel will generally wear surgical inner gloves with nitrile outer gloves as described on page 36, however the nitrile outer gloves will be removed during delicate sampling procedures such as capping VOA vials.
- See amended text.
47. See Table 6.1 in revised POP
48. The SOP for organic glassware is attached. See amended text.
49. See amended text.
50. The recommendation is noted.
51. See amended text.
52. See response to Comment No. 7 and amended text.
53. See amended text.
54. See amended text.
55. Sirrine believes that half-face respirators provide adequate respiratory protection under certain situations. The chemical and physical properties of each site contaminant, as well as the concentration and toxicity, were fully evaluated prior to the development of a site respiratory protection policy. Our Health and Safety Plan clearly defines circumstances affecting the selection of proper respirators. Table 7.1 outlines respirator requirements at the Medley Farm Site.

The OSHA requirement for 5-minute escape packs is only for preliminary assessments of a site, when no information regarding potential contaminants is available.

56. The required PPE has been added to the POP. See amended text.